

**Supporting Document to our SUBMISSION on the  
PROPOSED PORIRUA DISTRICT PLAN**

**To The Commissioners**

**Introduction**

Firstly, we would like to say that we are a long way short of being technical experts in the field of Planning, but we believe the District Plan exists to provide the residents and Council with guidance and support as time moves on and situations and opportunities change.

That said, the documents and reports provided during this process are now way beyond the ability of a non-trained professional to read and comprehend and this became very obvious when reading some of the section 42 reports and observing reference to other documents such as the NES, NPS, PNRP and the RPS to name a few.

Putting the difficulties aside that the entire process creates, we have some very simple comments to make which we hope will add some value to the process.

**Section 32 Report Part B – Rural Zone**

When we read this report, it provided us with some hope that that the proposed plan would contain recommendations that reflected what was happening in the region.

We feel it is fair to say that the PDP doesn't reflect the Section 32 Evaluation Report, Part 2: Rural Zones.

*(Page 1) This Zone was introduced when the District Plan was notified in 1994 and became fully operative in 1999. The policy focus of the zone is on preserving rural character and landscape values. Rules around land use activity and subdivision reflect intentions to enable primary production activities (farming and forestry), and to try and avoid pressure for change. However, rural lifestyle intensification has occurred as demand for this type of lifestyle has continued to grow.*

We believe the above statement sets the scene, but the key points are not made until section 5 Resource Management Issues Analysis.

*(Page 15) Primary Production activities  
Much of the City's rural area currently has limited value for primary production as a result of steep topography and low soil quality. Most of the rural area is classified as Class 6 or 7*

*(Page 17) The profitability of pastoral (sheep) farming has been falling for several decades. For many years, wool and lamb prices have been falling combined with increasing costs of supplementary feed and transportation.*

*Many of Porirua's original farm blocks have been incrementally fragmented through lifestyle subdivision. There is little in the way of rural support services available in Porirua and as a result shearing and fencing contractors have to travel some distance to Porirua. Purchasing rural supplies and buying/selling stock is more difficult and expensive.*

And

*The plantation forestry sector has had its ups and downs with variable timber markets and problems with rising costs of harvesting, transport and processing. Anecdotally, many owners of small to medium sized woodlots in Porirua have reported that they have not harvested due to marginal returns and logistical challenges.*

*However, there may be future interest in plantation forestry in Porirua with the nationwide resurgence of this industry. It is likely that plantation forestry will increasingly be incentivised by Central Government, which has an ambitious programme to plant significantly more trees to mitigate the effects of New Zealand's domestic greenhouse gas emissions.*

*There are also opportunities for the rural sector to supplement their income with aggregate extraction and processing. There is a region-wide shortage of aggregate to enable infrastructure projects and urban growth.*

*In summary, in Porirua's rural area natural and economic constraints have resulted in there being no farms that rely solely on primary production activity for income, it does make a contribution to the local economy which has flow-on benefits for wider community well-being. There are opportunities for it to play a greater role in Porirua's economy in the future.*

This report outlines major issues for farming and other rural based industries in the district and shows the main reasons why many of the large farms are being subdivided into smaller lots, so they are more easily sold off. Smaller blocks (not lifestyle size) are more affordable and therefore more viable to sell and it is assumed that the smaller blocks will have better development opportunities.

The 4<sup>th</sup> paragraph quoted above indicates *There are opportunities for it to play a greater role in Porirua's economy in the future*. But the report doesn't outline what these opportunities might be except maybe forestry or aggregate production but both options, in our view, will be more difficult to develop under the proposed plan and this especially applies to our land which has SNA and SAL designations proposed. It could also be read that the opportunities lie with further lifestyle development but again, the proposed rules will not help this type of development.

The current rules were introduced in 1994 and came into effect in 1999, since then the local rural industry and the Porirua region have changed considerably, and this is outlined in the report on page 18.

*(Page 18) However, the predominant land use change trend in the last two decades has been rural lifestyle intensification.*

*There is increasing pressure for rural lifestyle subdivision in Porirua's rural area. The main reasons for this are:*

- *The relatively minor economic significance of the rural area's primary production activity.*
- *The relatively difficult nature of the land for farming and forestry.*
- *The relative ease of access of the rural area to metropolitan areas of Wellington.*
- *The attractiveness of the landscape and harbour amenities of Porirua for rural living.*
- *Average property values have continued to increase, which influences land use intensification.*

The final comment of note in this report is on page 19 and reads as follows:

*(Page 19) In view of the challenges faced by the rural economy (addressed above), more lifestyle development can be expected. Marginal returns from primary production make it more appealing for rural landowners to sell surplus land where demand for other land uses (i.e. rural lifestyle development) offers a return on investment.*

While we accept that converting every rural space to a small lifestyle block isn't what the city needs, we believe the best economic use for much of the city's rural land is to have appropriate controlled lifestyle development and to use flexibility when planning how these developments will impact on the community and the landscape.

Continuing to use rules developed in the 1990's as part of a District Plan Review in 2021 appears to be a long way short of demonstrating progressive leadership especially when the Councils own section 32 report appears to support significant upgrading and change for this section of the District plan.

This was the main reason for our submission and our request to make changes to the proposed district plan. We were very disappointed to note that our recommendations, along with similar recommendations from other submitters, have been rejected in the Section 42 reports.

We are also disappointed that the people preparing the section 42 reports, while they have looked at all the submissions and other outlying documents, they don't appear to have read the Councils own section 32 report on the Rural area because there is no reference to it.

It would appear Council are proposing only one change in the section 42 reports as a result of the section 32 report:

*Section 42 Report: Part B – Natural Features and Landscapes*

- *Amending the activity status in NFL-R1 for earthworks or land disturbance in a SAL from non-complying to discretionary;*
- *Amending the activity status in NFL-R12, the 'catch all' rule, from non-complying to discretionary;*

**We have asked for:**

(a) that the Proposed Porirua District Plan be amended to address the matters set out in the submitter's submission, including:

- rezoning the property, or parts of the property, "Rural Lifestyle Zone"; and
- the removal of the "Special Amenity Landscapes" overlay from the property; or in the alternative, the incorporation of a policy framework and associated rules that enable appropriate development within the "Special Amenity Landscapes" overlay area consistent with rural lifestyle development, with such provisions to not be overly prescriptive and constraining; and
- the removal of "Significant Natural Area 193" from the property; or, in the alternative, the incorporation of a policy framework and associated rules that enable appropriate development within "Significant Natural Areas", with such provisions to not be overly prescriptive and constraining; and

(b) such further other amendments as considered appropriate and necessary to address the submitter's concerns regarding the sustainable management and use of the submitter's property, including the minimum allotment size of 40 hectares in the General Rural Zone if that zoning is retained for some or all of the property.

### **Scope for Compromise**

We believe there is (in the case of the land we own) significant scope for a compromise on the development of the site which would see many of the goals of both parties achieved.

Our site is currently stocked by the former landowner to help maintain its appearance. At present we receive no income and we have been told that leasing the property (150 plus hact) for grazing may return \$15,000/ year. To achieve this, we would need to provide some form of stock handling facilities, fertilising, and spraying etc, unfortunately the numbers don't stack up so giving away the grazing to maintain the site is a good temporary result.

The proposed district plan rules don't appear to allow or encourage flexibility and while we are sure Council staff are keen to see the best use of the land, the proposed plan won't provide them with the support they need to develop innovative solutions. The proposed rules are still using guidelines set in 1994 and the current situation is very different.

We believe some form of lifestyle development on the site is the only way to get a viable return on the land unless we can set up a gravel extraction operation.

We believe a controlled lifestyle development can be done with very little impact on the SAL and no impact on the SNA.

We also believe there is significant scope to work with Council to enhance the site with walking tracks, riparian planting, native planting, and strategic landscaping.

Controlling the way lifestyle blocks are positioned and shaped and by allowing certain types of access, we believe the area could be significantly enhanced.

We also believe there is scope for trade off's especially within the SAL by offsetting any potential visual impacts with enhanced planting around buildings and control over colours used etc.

In our view, most lifestyle block owners don't want a farm, they want some space and perhaps a sheep or two. Those that want larger blocks could be catered for within a development if a greater range of lot sizes was possible within the rules.

There is also scope for each property to be contained on a smaller site with the land around them being owned by a single owner to ensure it is maintained correctly.

Another option is to look at the balance of the land and how it could be used to help with the Governments Net Zero Carbon legislation. There are some interesting possibilities for the type of land we own, contained in the Council report "Summary of analysis and findings Rural-residential zoning options" prepared by Land Matters June 2020. Several pages of this report are devoted to the options that are available and several of these would be worth investigating further.

What we are trying to say is that there are a lot of development options and possibilities to help achieves everyone's goals with a minimum of compromise, but we can't see how the outdated rules contained in the proposed district plan are going to assist us or the Council to make it happen.

If some form of development isn't possible for this land, and reading some of the section 42 reports, forestry and quarrying are not options, and conventional farming isn't a profitable option, then what is the economic use for the land and how can it be sustainably managed?

**We have also looked at some other sections within the proposed plan and tried to match them to the Councils section 32 report and we would comment as follows:**

**From a strategic point of view: (Page 3)**

***FC-03 Existing activities***

*The ongoing operation, character and amenity values of existing activities are protected from incompatible activities.*

How does this work when the existing activities change over time?

How does this work when the change is recognised in the Section 32 report but not in the Content of the proposed District Plan?

#### **FC-04 Compatible activities**

*Compatible activities with similar effects and functions are located together in appropriate areas and:*

- 1. Are consistent with the anticipated character and amenity values of the areas where they are located; and*
- 2. Contribute to the efficient use of land, resources and infrastructure.*

How do you achieve efficient use of land and resources when the rules don't acknowledge that the situation has changed, and the existing rules are no longer relevant?

#### **RE-01 Rural environment**

*Porirua has a productive rural environment that provides an attractive, open backdrop to the city and contributes to the city's wellbeing.*

The perfect example, this isn't the description of the rural environment provided in the section 32 report. If the strategic plan isn't right, how can the rules be right?

The open backdrop to the city can't be maintained if farming the land is no longer viable.

#### **RE-02 Rural lifestyle living**

*There are lifestyle living opportunities in parts of the rural environment where these are:*

- 1. Close to urban areas;*
- 2. Consistent with protecting Porirua's natural environmental values;*
- 3. Able to be safely accessed from a road network with sufficient capacity;*
- 4. At no significant risk from natural hazards; and*
- 5. Consistent with ensuring sufficient land is available for urban growth.*

All these requirements are achievable if the rules have flexibility to allow them to be achieved but if the rules cannot be updated to reflect the current state of the rural zone, then the only way forward as we see it, is to remove the Special Amenity Landscapes and Significant Natural Areas overlays from our property (as requested in our submission) and this will achieve two results:

- It will mean that the ability to develop and subdivide our land will be measured against a different set of Plan guidelines ( which may provide a better outcome).
- If we are unable to do anything with our land it will mean that the additional costs created by the impacts of these overlays won't apply and on that basis we may be able to on-sell.

Just a note if development of our land was allowed, we have no intention of damaging the area of bush on our land described as SNA 193. In fact, if we were able to make the most of our land through development then part of the plan would include a significant upgrade of the area including walking tracks and perhaps even public access.

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